

LUTZ, SHAFRANSKI, GORMAN & MAHONEY, P.A.

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(732) 249-0444

Attorneys for Plaintiff(s)

Frank Lazzaro, Esq. I.D. #: 0238722006

Plaintiff,

VINCENT LEPORINO

VS.

THE HOME DEPOT USA; and ABC
CORPS. I-X and JOHN DOES I-X
(owner(s), tenant(s) or other
entity or persons responsible
for maintenance of the
property commonly known as The
Home Depot located at 3100
Hamilton Boulevard, South
Plainfield, New Jersey 07080
and/or other entities or
individuals responsible for
snow/ice removal at property
commonly known as The Home
Depot, as aforementioned)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION:MIDDLESEX COUNTY
DOCKET NO.

CIVIL ACTION

COMPLAINT AND DEMAND
FOR TRIAL BY JURY

Plaintiff, residing at 411 Arlington Avenue, South
Plainfield, New Jersey, complaining of the defendants, hereby
alleges and says:

FIRST COUNT

1. On or around January 19, 2020, the plaintiff was a
lawful business invitee upon premises commonly known as the
The Home Depot located at 3100 Hamilton Boulevard, South
Plainfield, New Jersey 07080.

2. At the aforesaid time and place, the defendant(s) so carelessly and negligently owned, leased, managed, maintained, operated, and/or controlled said premises such that the premises were dangerous and unsafe and the plaintiff was caused to fall thereupon.

3. As a direct and proximate result of the carelessness and negligence of the respective defendant(s) as aforesaid, the plaintiff sustained severe personal injuries, has and will suffer pain, has and will incur medical expenses, and has and will be unable to engage in his usual occupation, duties, and activities, all to his damage.

WHEREFORE, plaintiff demands judgment against defendants for damages, interest, and costs of suit on this count.

SECOND COUNT

1. Plaintiff repeats and reiterates each and every allegation set forth in the First Count and makes them a part hereof as fully set forth herein at length.

2. On and before January 19, 2020, defendant(s) was/were the snow/ice amelioration contractors for premises commonly also known as The Home Depot located at 3100 Hamilton Boulevard, South Plainfield, New Jersey.

3. On and before January 19, 2020, said defendants carelessly and negligently performed or failed to perform snow/ice removal/amelioration services such that the premises

were dangerous and unsafe, and the plaintiff was caused to fall thereupon.

4. As a direct and proximate result of the carelessness and negligence of the defendants aforesaid, the plaintiff sustained severe personal injuries, has and will suffer pain, has and will incur medical expense, and has and will be unable to engage in his usual occupation, duties and activities, all to his damage.

WHEREFORE, plaintiff demands judgment against defendants on the Second Count for damages, interest and costs of suit.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury as to all issues in the within Complaint.

CERTIFICATION PURSUANT TO R. 4:5-1

The matter in controversy in this case is not, to the best of my knowledge, the subject of any other action pending in any Court or pending Arbitration proceeding, nor is any action or Arbitration contemplated at this time. I am not aware of any other parties who should be joined in this action at the present time.

DESIGNATION OF TRIAL COUNSEL

In accordance with R. 4:25-4, Frank Lazzaro, Esq. is hereby designated as trial counsel in the within matter.

LUTZ, SHAFRANSKI, GORMAN
and MAHONEY, P.A.
Attorneys for Plaintiff(s)

BY:  _____

FRANK LAZZARO

DATED: November 17, 2021

LAW OFFICES
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Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-006674-21

Case Caption: LEPORINO VINCENT VS THE HOME
DEPOT USA
Case Initiation Date: 11/18/2021
Attorney Name: FRANK T LAZZARO
Firm Name: LUTZ SHAFRANSKI GORMAN & MAHONEY,
PA
Address: 77 LIVINGSTON AVE P.O. BOX 596
NEW BRUNSWICK NJ 08903
Phone: 7322490444
Name of Party: PLAINTIFF : Leporino, Vincent
Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: PERSONAL INJURY
Document Type: Complaint with Jury Demand
Jury Demand: YES - 6 JURORS
Is this a professional malpractice case? NO
Related cases pending: NO
If yes, list docket numbers:
Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO
Are sexual abuse claims alleged by: Vincent Leporino? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

11/18/2021
Dated

/s/ FRANK T LAZZARO
Signed

